

**REMARKS**

Claims **1-22, 33** and **34** were pending.

Claims **1-22, 33** and **34** have been rejected.

Claims **1, 2, 12, 13** and **34** have been amended. No new matter has been added.

Claim **33** is cancelled herein.

Claims **23-32** remain cancelled.

Claims **35-37** have been added herein. No new matter has been added.

Therefore, claims **1-22** and **34-37** remain pending.

Support for the claim amendments can be found throughout the originally-filed Application, e.g., at least at paragraphs [0018], [0020], and [0035]-[0037] of the Application, and Figs. 3A-3C, among others.

**Double Patenting**

Claims 1-22, 33, and 34 are rejected on the ground of non-statutory obviousness-type double patenting as being unpatentable over claims 1-24 of co-pending Application No. 10/696,156. Applicants respectfully submit that a Terminal Disclaimer with regard to the co-pending 10/696,156 application was filed on January 26, 2011, and was approved on April 14, 2011. Applicants therefore respectfully submit that the current double patenting rejection over the co-pending 10/696,156 application is moot. In view of this, Applicants respectfully request that the double patenting rejection of claims 1-22 and 34 (claim 33 is cancelled herein) be reconsidered and withdrawn.

**Rejection of Claims under 35 U.S.C. § 103**

**Claims 1-4, 12-15, and 33-34**

Claims 1-4, 12-15, and 33-34 are rejected under U.S.C. § 103(a) as being unpatentable over Coleman, U.S. Patent No. 5,708,828 (Coleman) in view of Balgeman, U.S. Patent No. 5,446,880 (Balgeman) and further in view of Rauber, U.S. Patent No. 6,182,053 (Rauber). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Coleman, Balgeman, and Rauber, alone or in any rational combination, fail to teach or suggest all the elements of independent claim 1, as amended, including:

“...  
generating an inventory balance delta, wherein  
the inventory balance delta is calculated as a difference between a source  
inventory balance and a target inventory balance,  
the source inventory balance information in the intermediate format  
comprises the source inventory balance,  
the target inventory balance information in the intermediate format  
comprises the target inventory balance, and  
the generating is performed by the integration server, and  
...”

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as Applicants are able to discern, Coleman does not teach or suggest generating an inventory balance delta. Further, the Office Action (correctly) fails to cite any passages of Coleman against any elements of claim 1 related to generating an inventory balance delta. Applicants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record by any node are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Applicants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the claimed generating of an inventory balance delta. Further, the Office Action (correctly) also does not cite Balgeman for any elements of claim 1 related to generating an inventory balance delta. Applicants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

Rauber also fails to remedy these deficiencies. Rauber, in general terms, relates to techniques for managing inventory in a distressed inventory warehouse with the aid of a programmable computer. *Rauber*, Abstract. Rauber discusses programmable input devices that are in communication with a host computer and may include portable scanning devices. *Rauber*, 3:27-34. The programmable input devices of Rauber are operable for inputting or scanning the machine-readable inventory labels, and for communicating with the host computer for receiving and transmitting tracking, sales and other status information. *Id.*

On page 7, the Office Action cites various portions of Rauber, but fails to particularly point out what elements of Rauber might somehow be mapped to the elements of claim 1 related to generating an inventory balance delta. Applicants, as an initial matter, assume that this is the case because, in fact, no such parallel can be successfully drawn. The cited portions of Rauber include the following:

f) entering updating information into the programmable input device whenever the inventory information changes; g) sending the updating information from the programmable input device to the computer; and h) updating the inventory data record stored in the host computer in response to receipt of the updating information.

*Rauber*, 3:45-55.

It appears that the Office Action may be attempting to equate the element of “updating information” of Rauber to the elements of claim 1 related to generating an inventory balance delta. Even if such a proposition is intended, there exists no basis for drawing such a conclusion, and Applicants respectfully disagree therewith. The updating information of Rauber is merely tracking information and the like, associated with a certain inventory item (as identified by a certain inventory label). Rauber merely discloses sending such information to a host computer.

As recited in claim 1, the inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance. In contrast, the “updating information” of Rauber only contains order information for a certain item in the inventory. *Rauber*, 3:56-60. Thus, there is no element in Rauber that is “calculated as a difference between a source inventory balance and a target inventory balance.” Certainly, the “updating information” is not calculated in any way, much less as recited by claim 1, at least because the “updating information” of Rauber only reflects a single amount of a certain item. Therefore, the “updating information” of Rauber cannot be equated to the “inventory balance delta” of claim 1, at least because Rauber’s “updating information” is neither calculated, nor is a difference, and is but a single value. This

being the case, Rauber cannot teach or suggest generating an inventory balance delta, much less generating an inventory balance delta that is calculated as a difference between a source inventory balance and a target inventory balance. Thus, Rauber, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 1, among others.

In summary, since the combination of Coleman, Balgeman, and Rauber does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and Rauber cannot render claim 1 obvious. Furthermore, independent claim 12 is patentable over Coleman, Balgeman, and Rauber for similar reasons to independent claim 1, and further in view of its own features. Still further, claims 3-4 and 34, which depends from independent claim 1, and claims 13-15, which depend from independent claim 12, are patentable over Coleman, Balgeman, and Rauber for at least the reasons provided for their respective base independent claims, and further in view of their own features. Claim 33 is cancelled herein. Accordingly, Applicants respectfully request that the rejection of claims 1-4, 12-15, and 34 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

#### Claims 5-11 and 16-22

Claims 5-11 and 16-22 are rejected under U.S.C. § 103(a) as being unpatentable over Coleman, in view of Balgeman, and further in view of Rauber as applied to claims 1-4, 12-15, and 33-34 above, and further in view of Katz, U.S. Publication No. 2002/0178077 (Katz).

As described above, independent claims 1 and 12 are patentable over Coleman, Balgeman, and Rauber. Upon review of Katz, Applicants can discern no showing, teaching, or even suggestion that Katz in any way remedies the deficiencies of Coleman, Balgeman, and Rauber, and therefore claims 1 and 12 are also patentable over Coleman, Balgeman, Rauber, and Katz, alone or in combination. Applicants further assert that claims 5-11, which depend from claim 1, and claims 16-22, which depend from claim 12, are also patentable over Coleman, Balgeman, Rauber, and Katz for at least the reasons provided for their respective base claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 5-11 and 16-22 be reconsidered and withdrawn.

New Claims 35-37

New claims 35-37 are added herein. Support for the new claims can be found throughout the originally-filed Application and/or a Provisional Patent Application No. 60/457,434 filed March 24, 2003 (the “Provisional Application”) from which the current Application claims priority (as well as incorporates it by reference). For example, support for the new claims can be found at least at paragraphs [0017], [0018], [0037], and Figs. 3B-3C of the Application, as well as on pages 24 and 25 of the Provisional Application, among others.

New claims 35-37 are dependent on independent claim 1. Applicants respectfully submit that these new claims are allowable at least for the reasons stated for independent claim 1.

**CONCLUSION**

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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